



Tarter Krinsky & Drogin LLP
1350 Broadway
New York, NY 10018
P 212.216.8000
F 212.216.8001
www.tarterkrinsky.com

Mark Berkowitz
Partner
212-216-1166
mberkowitz@tarterkrinsky.com

Via ECF

March 1, 2023

The Honorable Lewis J. Liman, U.S.D.J.
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Mango Labs, LLC v. Eisenberg*, No. 1:23-cv-00665-LGD
Consented Letter-Motion for Extension of Time to Respond to Complaint

Dear Judge Liman:

We represent Defendant Avraham Eisenberg (“Defendant”) in the above-referenced matter. We write jointly with Plaintiff to request an extension of time: for Defendant to respond to the Complaint (ECF No. 1) and for Plaintiff to respond to any subsequent Rule 12 motion.

The current deadline for Defendant to respond to the Complaint is March 2, 2023. The Parties jointly request entry of the following schedule:

- 1) Defendant’s deadline to answer or otherwise respond to the Complaint shall be extended by thirty (30) days through and including **April 3, 2023**.
- 2) To the extent that Defendant files a motion in response to the Complaint rather than file an answer, Plaintiff shall have an additional (30) days beyond the (14) days provided for under the local rules to file its opposition to the motion.

In connection with this action, Defendant waives any objections to service of process.

This is Defendant’s first request for an extension of time to respond to the Complaint. The Parties are next scheduled to appear before the Court on March 10, 2023.

Respectfully submitted,

s/ Mark Berkowitz
Mark Berkowitz

cc: All Counsel of Record via ECF